



**FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD**

APPELLANT: John O'Leary
DOCKET NO.: 24-22017.001-R-1
PARCEL NO.: 11-29-102-037-0000

The parties of record before the Property Tax Appeal Board are John O'Leary, the appellant, by attorney William I. Sandrick, of Sandrick Law Firm, LLC in Homewood; and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **A Reduction** in the assessment of the property as established by the **Cook** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$17,875
IMPR.: \$50,125
TOTAL: \$68,000

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Cook County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2024 tax year. The Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of the appeal.

Findings of Fact

The subject property consists of a 3-story dwelling of masonry exterior construction with 8,925 square feet of building area.¹ The building was constructed in 1913 and is approximately 111 years old. Features of the property include a full unfinished basement and a 3.5-car garage. The property has an approximately 6,500 square foot site and is located in Chicago, Roger Park Township, Cook County. The subject is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$680,000 as of January 1, 2024. The appraisal was prepared by Paul K. Moy, a Certified Residential Real

¹ The parties differ as to the size of the subject building. The Board finds the best evidence of size is found in the appraisal submitted by the appellant, which contained a schematic diagram and dimensions of the building.

Estate Appraiser and Ibi Cole, a Certified General Real Estate Appraiser. The property rights appraised were fee simple. The report was developed to provide an opinion of the market value of the subject property for ad valorem tax assessment purposes. The appraisers noted the subject property was vacant and in fair to poor condition and not rentable in its current condition. The appraisers noted the subject property has significant deferred maintenance throughout which include damaged walls, settling ceilings, scuffed hardwood floors, missing floor tiles and kitchen cabinetry, and older windows. The appraisal contained photos of the deferred maintenance items. The appraiser estimated a cost cure of \$450,000 to make the property livable and rentable.

The appraiser completed the income and sales comparison approaches to value in estimating the market value of the subject property. Under the income approach the appraiser estimated a market value of \$690,000 after subtracting the cost to cure of \$450,000.

Under the sales comparison approach, the appraiser utilized six comparable sales that are located in Chicago and from .10 of a mile to 2.98 miles from the subject. The multi-family buildings range in size from 7,894 to 10,683 square feet of building area and have features with varying degrees of similarity to the subject. The comparables sold from November 2021 to September 2023 for prices ranging from \$975,000 to \$1,675,000 or from \$105.79 to \$181.00 per square foot of building area, including land. The appraiser gave most weight to comparable #1, the most recent sale and comparables #4 and #5 provide additional support due to similar gross building area or having similar two bedroom units. Based on these comparable sales, the appraiser estimated a market value of \$670,000 after subtracting the cost to cure of \$450,000.

In final reconciliation the appraiser gave equal weight to both approaches to value.

Based on this evidence the appellant requested a reduction in the subject's assessment to reflect the appraised value.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$90,299. The subject's assessment reflects a market value of \$902,990 or \$101.18 per square foot of building area, including land, when applying level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales with the same assessment neighborhood code as the subject. Comparable #1 is located within a ¼ of a mile from the subject. Proximities to the subject were not disclosed for comparables #2, #3 and #4. The comparables have sites ranging in size from 3,960 to 8,800 square feet of land area that are improved with 2-story or 3-story buildings of stucco or masonry exterior construction ranging in size from 1,960 to 7,481 square feet of building area and in age from 108 to 113 years old. The comparables have features with varying degrees of similarity to the subject in features. The comparables sold from January 2022 to December 2023 for prices ranging from \$450,000 to \$925,000 or from \$109.38 to \$229.59 per square foot of building area, including land. Based on this evidence the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The appellant contends the market value of the subject property is not accurately reflected in its assessed valuation. When market value is the basis of the appeal the value of the property must be proved by a preponderance of the evidence. 86 Ill.Admin.Code §1910.63(e). Proof of market value may consist of an appraisal of the subject property, a recent sale, comparable sales or construction costs. 86 Ill.Admin.Code §1910.65(c). The Board finds the appellant met this burden of proof and a reduction in the subject's assessment is warranted.

The record contains the appellant's appraisal and four comparable sales submitted by the board of review to support their respective positions for the Board's consideration.

The Board finds the best evidence of market value to be the appraisal submitted by the appellant, particularly given the descriptive and photographic evidence of condition issues related to the subject dwelling that were not refuted by the board of review. Furthermore, the Board finds the appraiser's value conclusion was not challenged by the board of review. Lastly, the Board finds the comparable sales presented by the board of review were given less weight as they were less similar to the subject in building size than the comparables used in the appraisal. The subject's assessment reflects a market value of \$902,990 or \$101.18 per square foot of building area, including land, which is greater than the appraised value. Based on this record, the Board finds a reduction in the subject's assessment commensurate with the appellant's request is warranted.

This is a final administrative decision of the Property Tax Appeal Board which is subject to review in the Circuit Court or Appellate Court under the provisions of the Administrative Review Law (735 ILCS 5/3-101 et seq.) and section 16-195 of the Property Tax Code. Pursuant to Section 1910.50(d) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.50(d)) the proceeding before the Property Tax Appeal Board is terminated when the decision is rendered. The Property Tax Appeal Board does not require any motion or request for reconsideration.



Chairman



Member



Member



Member

Member

DISSENTING: _____

CERTIFICATION

As Clerk of the Illinois Property Tax Appeal Board and the keeper of the Records thereof, I do hereby certify that the foregoing is a true, full and complete Final Administrative Decision of the Illinois Property Tax Appeal Board issued this date in the above entitled appeal, now of record in this said office.

Date: June 16, 2026



Clerk of the Property Tax Appeal Board

IMPORTANT NOTICE

Section 16-185 of the Property Tax Code provides in part:

"If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel after the deadline for filing complaints with the Board of Review or after adjournment of the session of the Board of Review at which assessments for the subsequent year or years of the same general assessment period, as provided in Sections 9-125 through 9-225, are being considered, the taxpayer may, within 30 days after the date of written notice of the Property Tax Appeal Board's decision, appeal the assessment for such subsequent year or years directly to the Property Tax Appeal Board."

In order to comply with the above provision, YOU MUST FILE A PETITION AND EVIDENCE WITH THE PROPERTY TAX APPEAL BOARD WITHIN 30 DAYS OF THE DATE OF THE ENCLOSED DECISION IN ORDER TO APPEAL THE ASSESSMENT OF THE PROPERTY FOR THE SUBSEQUENT YEAR OR YEARS. A separate petition and evidence must be filed for each of the remaining years of the general assessment period.

Based upon the issuance of a lowered assessment by the Property Tax Appeal Board, the refund of paid property taxes is the responsibility of your County Treasurer. Please contact that office with any questions you may have regarding the refund of paid property taxes.

PARTIES OF RECORD

AGENCY

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